

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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In re:

Tena M Hendrickson,

Case No. 21-26103-beh

Chapter 13

Debtor.

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**NOTICE OF APPLICATION FOR ALLOWANCE AND PAYMENT OF  
FEES AND EXPENSES OF DEBTOR'S COUNSEL**

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**To: All Creditors, U.S. Trustee, and Debtor:**

PLEASE TAKE NOTICE that the law firm of Steinhilber Swanson LLP ("Applicant"), Debtor's counsel in this case, has filed an Application for Allowance and Payment of Fees and Expenses of Debtor's Counsel (the "Fee Application"), in which it has applied to the Court for the following:

1. Approval of Applicant's fees for services rendered as Debtor's counsel, in the amount of \$25,840.00 together with reimbursement for actual and necessary expenses incurred in the amount of \$635.38, for a total of \$26,475.38 (the "Fee Award") during the period from January 20, 2021 through April 8, 2022 (the "Fee Period").
  - a. The Applicant has received \$2,048.00 in prepetition fees and costs advanced by the Debtor;
2. Payment of the unpaid balance of the Fee Award, in the amount of \$24,427.38 after accounting for the pre-petition payments summarized above, to be disbursed to Applicant as follows:
  - a. Applicant is currently holding \$80.14 in its Client Trust Account, related to cost advances which the Debtor reimbursed to Applicant on a post-petition basis, which the Applicant is requesting approval to disburse against the Fee Award;
  - b. The balance of the Fee Award, in the amount of \$24,347.24, shall be payable through the Plan, to be disbursed by the Trustee from Plan payments.

A copy of the Fee Application can be obtained either electronically from or at the office of the Bankruptcy Clerk of Courts whose address is listed below, or can be obtained by requesting copies from the undersigned.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in the bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the Court to grant the Applicant's Fee Application, or if you want the Court to consider your views on the matter, then no later than **21 days from the date of this Notice**, you or your attorney must:

1. File with the Court a written objection at:

Clerk of the U. S. Bankruptcy Court  
Room 126, Federal Courthouse  
517 E. Wisconsin Avenue  
Milwaukee, WI 53202

If you mail your objection to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

2. You must also mail a copy to:

Office of the U. S. Trustee  
517 E. Wisconsin Ave., Rm 430  
Milwaukee, WI 53202

Attorney John W. Menn  
Steinhilber Swanson LLP  
107 Church Avenue  
Oshkosh, Wisconsin 54901

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Fee Application and may enter an Order granting that relief.

Dated this April 8, 2022.

STEINHILBER SWANSON LLP

By: /s/ John W. Menn  
John W. Menn  
Attorney for the Debtor  
107 Church Avenue  
Oshkosh, WI 54901  
Tel: (920) 426-0456; Fax: (920) 426-553

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NOW COMES the firm of Steinhilber Swanson LLP (hereinafter "Applicant"), by Attorney John W. Menn, and pursuant to 11 U.S.C. § 330 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, and Local Rule 2016, submits this Application for Allowance and Payment of Fees and Expenses of Debtor's Counsel (the "Fee Application"), and in support thereof states as follows:

**Jurisdiction and Background**

1. The Debtor in this Chapter 13 case retained Applicant as general bankruptcy counsel to aid her in the advancement of this case, and applicant first performed work in connection with this bankruptcy on January 20, 2021.
2. On November 29, 2021 (the "Petition Date"), Tena M. Hendrickson (the "Debtor") filed a voluntary petition under Chapter 13 of Title 11 of the U.S. Bankruptcy Code (the "Bankruptcy Code").

**Fee Period Request**

3. This Fee Application requests final approval and payment of fees and expenses in this case accruing during the period from January 20, 2021 through April 8, 2022 (the "Fee Period").
4. The regular hourly rates for attorneys and paraprofessionals of the firm who performed work on this case ranged from \$180.00 - \$475.00 per hour during the Fee Period.
5. During the Fee Period, Applicant expended 95 hours on this case. A breakdown of total time spent by each timekeeper involved in the case during the Fee Period is as follows:

<u>Name</u>	<u>Position</u>	<u>Hours Worked</u>	<u>Total Billed</u>	<u>Average Hourly Rate</u>
John W. Menn	Partner	9.5	\$ 3,745.50	\$ 394.26
Virginia E. George	Partner	0.2	\$ -	\$ -
Beth M. Brockmeyer	Senior Associate	83.4	\$ 21,742.50	\$ 260.70
Cynthia A. Krutke	Paralegal	1.9	\$ 352.00	\$ 185.26
<b>Total:</b>		<b>95</b>	<b>\$ 25,840.00</b>	<b>\$ 272.00</b>

6. Based upon the hourly rates stated above and the time expended by Applicant, the value of the services rendered by Applicant during that time period was \$25,840.00. In addition, reasonable and necessary costs of \$635.38 were incurred, for an aggregate total of \$26,475.38 (the "Fee Award") earned by Applicant during the Fee Period.
7. In the Fee Period, Applicant assessed the Debtor's financial situation and options, assisted the Debtor in preparing loan modification documents for Debtor's first mortgage on a pre-petition basis in an effort to resolve as many mortgage-related issues as possible prior to the bankruptcy filing; reviewed recorded real estate documents and foreclosure case filings regarding lien priority on the Debtor's homestead real estate; researched the issue of the Legacy Bank mortgage and related judgments docketed in 2 counties, arising from an old mortgage debt which had been assigned to the FDIC when Legacy Bank closed, and through extensive efforts and negotiations with the FDIC in its capacity as a receiver of Legacy Bank debt, obtained the release and satisfaction of the mortgage and judgments, effectively resolving and eliminating this \$250,751.43 disputed judgment claim, which significantly improved the Debtor's ability to reorganize; based on the progressing foreclosure involving the First American Capital Corporation ("FACC") and Rushmore Loan Servicing ("Rushmore"), the Debtor entered chapter 13 to resolve the remaining issues. Preparing and filing the petition and schedules required extensive document review

to accurately and fully assess the Debtor's self-employment and other financial records and ensure accuracy. Post-petition, Applicant negotiated with First American Capital Corporation on a second mortgage for a reduced claim amount to be paid through the plan (at significant savings to the Debtor) and drafted and filed a Motion for Referral to Mortgage Modification Mediation Program to finish dealing with the Rushmore mortgage. The time spent reviewing, compiling, assessing, and clarifying the self employment information in connection with the bankruptcy schedule preparation also assisted in the Debtor's efforts to obtain a mortgage modification through the MMM Program (which is ongoing), as the self employment information was much better prepared by the time the Debtor applied for and entered the MMM Program. Applicant's efforts and positive results in connection with the mortgage issues have allowed the Debtor to propose a feasible plan. Throughout the case, Applicant and Debtor have had extensive communications / discussions regarding bankruptcy and MMM Program requirements and obligations, in order to comply with all Court, Trustee, and creditor requirements. Applicant has also reviewed the proof of claim on file by Rushmore for potential objection due to extraordinary attorney fees (negotiations on this issue are ongoing through the MMM Program); drafted and uploaded mortgage mediation documents to the portal; attended the 341 hearing; drafted and filed an amended plan resolving issues raised by the Trustee at the 341 meeting, ultimately obtaining confirmation of the Plan; and prepared and drafted this fee application.

8. Applicant has applied line-item discounts to reduce the total fee request, in order to reduce or eliminate items where multiple attorneys were involved, where the total time involved to complete the work was greater than expected, where the time involved was in the nature

of training time, and as a courtesy to the Debtor to make the total amount of the fees more manageable.

9. Detailed time records are attached as Exhibit A to this Fee Application.
10. Applicant is experienced in bankruptcy matters and in Chapter 13 proceedings. Applicant's hourly rates are in conformity with the rates charged by similarly situated bankruptcy counsel. A summary of the attorneys and professional staff who performed work on this case during the Fee Period is attached hereto as Exhibit B, pursuant to the requirement of Local Rule 2016(a)(1).
11. This Fee Application is submitted in conformity with the standards set forth in this district, which this Court uses in assessing the propriety of bankruptcy attorneys' fees. The standards include the time and labor required, the novelty and difficulty of the questions, the skill requisite to perform the legal service properly, the preclusion of other employment by the attorney due to acceptance of this case, the customary fees charged for like cases, whether the fee is fixed or contingent, time limitations imposed by the client or other circumstances, the amount involved and the results obtained, the experience, reputation, and ability of the attorney, the nature and length of the professional relationship with the client, and awards in similar cases.
12. Under the standards enumerated above, the Fee Award represents the reasonable value of the services rendered by Applicant as general bankruptcy counsel for the Debtor in this case during the Fee Period.

**Plan Funding and Payment of Compensation Awarded**

13. Applicant requests that the Fee Award be approved.

14. Applicant has not made previous application for fees and expenses in this matter, but has received \$2,048.00 in pre-petition fees advanced by the Debtor. In addition, Applicant received \$80.14 directly from the Debtor on a post-petition basis, to cover costs incurred in the case, and that amount remains in trust at this time..
15. Applicant requests an order that the unpaid balance of \$24,427.38, which is the balance of the Fee Award, less the pre-petition payments summarized above, be disbursed to Applicant from Plan payments, as follows:
- a. Applicant is currently holding \$80.14 in its Client Trust Account as summarized above, which the Applicant is requesting approval to disburse against the Fee Award;
  - b. The balance of the Fee Award, in the amount of \$24,347.24, shall also be payable through the Plan via trustee disbursements.
16. Applicant asserts that the Fee Award awarded hereunder constitutes an administrative priority claim, which will be paid from through the Debtor's Plan. Applicant has reviewed the confirmed Plan, and it provides for sufficient funding to pay the Fee Award as requested.
17. All services for which compensation is requested by Applicant were performed for, or on behalf of the Debtor, and not on behalf of any committee, creditor, or other person.
18. There is no agreement or understanding between the Debtor and any other person, other than principals of Applicant, for the sharing of compensation to be received for services rendered in this case.
19. Applicant certifies that it has generally complied with the guidelines set forth by the United States Trustee concerning fee applications.

WHEREFORE, Applicant prays that the Court enter an Order as follows:

1. Approving Applicant's compensation under the provisions of 11 U.S.C. § 330 in the amount of \$26,475.38, representing \$25,840.00 in attorney fees plus \$635.38 in reasonable and necessary costs, for compensation for professional services rendered by Applicant to the Debtor for the period from January 20, 2021 through April 8, 2022 in this proceeding and authorizing payment thereof as follows:
  - a. \$2,048.00 in pre-petition fees already paid by the Debtor;
  - b. Authorizing the Applicant to apply funds held in its Client Trust Account, in the amount of \$80.14, toward payment of the approved fees;
  - c. The balance of the Fee Award, in the amount of \$24,347.24, also to be disbursed by the Trustee from Plan payments, and
2. For any other relief the Court deems just and appropriate.

Dated this April 8, 2022.

STEINHILBER SWANSON LLP

By: /s/ John W. Menn  
John W. Menn  
Attorney for the Debtor  
107 Church Avenue  
Oshkosh, WI 54901  
Tel: (920) 426-0456; Fax: (920) 426-5530



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**EXHIBIT A – TIME RECORDS**

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Attached hereto is a detailed summary of the attorney fees and costs incurred in this matter, in chronological order, from January 20, 2021 through April 8, 2022 (the "Fee Period").

<u>Date</u>	<u>Staff ID</u>	<u>Work Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/20/2021	John W. Menn	Call with client and begin prep / analysis of ch 13, with follow up email on options	1.1	\$ 425.00	\$ 467.50
2/24/2021	Beth M. Brockmeyer	Reviewed mortgage statement, updated Schedules, ran CCAP and reviewed foreclosure action on CCAP	0.4	\$ 325.00	\$ 130.00
3/18/2021	Beth M. Brockmeyer	Phone conference with client re: status of foreclosure and proceeding with Chapter 13	0.5	\$ 325.00	\$ 162.50
3/18/2021	Beth M. Brockmeyer	Prepare fee agreement and attachments for Chapter 13	0.5	\$ 325.00	\$ 162.50
3/18/2021	Beth M. Brockmeyer	Multiple emails with JWM, Heather and Cindy getting up to speed on Hendrickson, finding docs from prior file 1.0	1	\$ -	\$ -
4/1/2021	Cynthia A. Krutke	Prepare draft letter to request Mortgage Modification and give authorization for direct contact with client	0.1	\$ 180.00	\$ 18.00
4/23/2021	Beth M. Brockmeyer	Review CCAP for forecosure status and results of 4/22/21 scheduling conference(.2); email to JWM re litigation regarding lien priority. (.1)	0.3	\$ 325.00	\$ 97.50
6/28/2021	Beth M. Brockmeyer	Follow up email to client re: forecloure case status	0.1	\$ -	\$ -
6/29/2021	Beth M. Brockmeyer	Email exchange with client re: mortgage modification	0.1	\$ -	\$ -
7/6/2021	Beth M. Brockmeyer	Review email from client (.1); phone call with JWM re: fee agreement and status of foreclosure matter (.2), review CCAP for case details (.2); review file documents regarding foreclosure (.3); email and voicemail for Attorney S. Schmeling re: status of foreclosure (.2)	1	\$ 325.00	\$ 325.00
7/27/2021	Beth M. Brockmeyer	Review file and status of foreclosure on CCAP prior to phone conference (.2); phone conference with Attorney S. Schmeling re: foreclosure action (.4); phone conference with client re: status of foreclosure (.2)	0.8	\$ 325.00	\$ 260.00

7/27/2021	Beth M. Brockmeyer	Phone conference with JWM re: status following phone conference with Attorney S. Schmeling, and notes to file re: same	0.3	\$	-	\$	-
8/23/2021	Beth M. Brockmeyer	Email exchange with client re: status of paying retainer for Chapter 13	0.1	\$	-	\$	-
8/30/2021	Beth M. Brockmeyer	Phone conference with client, notes to file and email to JWM re: status of foreclosure	0.3	\$	-	\$	-
9/7/2021	John W. Menn	Call with client re: mortgage issues and Chapter 13 options	0.7	\$	425.00	\$	297.50
9/7/2021	Beth M. Brockmeyer	email to Attorney S. Schmeling re: nature of motion hearing on CCAP; phone conference with client re: same	0.2	\$	325.00	\$	65.00
9/8/2021	John W. Menn	Meet with client to review documents and pull credit reports and discuss options in Chapter 13; follow up correspondence with BMB re: strategy to deal with Legacy Bank "ghost mortgage"	0.6	\$	425.00	\$	255.00
9/8/2021	Beth M. Brockmeyer	Review email from JWM re: case strategy	0.1	\$	-	\$	-
9/13/2021	Beth M. Brockmeyer	Email exchange with client re: mortgage modification appeal	0.1	\$	-	\$	-
9/17/2021	Beth M. Brockmeyer	Email response to client RE: review of Motion to Voluntary Dismiss Foreclosure	0.2	\$	325.00	\$	65.00
9/20/2021	John W. Menn	Email with client re: foreclosure dismissal and mortgage modification	0.1	\$	425.00	\$	42.50
9/20/2021	Beth M. Brockmeyer	Email exchange with client re: status of Rushmore mortgage (.2); phone conference with client re: same (.2); review of client provided documents for schedule drafting (.8)	1.2	\$	325.00	\$	390.00

9/21/2021	Beth M. Brockmeyer	Review client provided documents and continued draft petition (1.2); email client "homework" docs (.1); phone conference with Attorney N. Hahn re: FACC mortgage (.2); drafted three authorizations for contacting mortgage companies (.3); multiple email exchanges with client re: pending issues / prep (.4); researched Legacy Bank status (.9); reviewed recorded mortgage documents (.4); emailed draft of Scheduled D, E, and F to client for review (.1)	3.6	\$ -	\$ -
9/21/2021	Cynthia A. Krutke	Real estate search for mortgages and the warranty deed	0.2	\$ 180.00	\$ 36.00
9/22/2021	Beth M. Brockmeyer	Review CCAP re: lawsuits against client's former business and update schedules	0.6	\$ 325.00	\$ 195.00
9/23/2021	Beth M. Brockmeyer	Review email from Attorney N. Hahn re second mortgage settlement proposal	0.1	\$ 325.00	\$ 32.50
9/23/2021	Beth M. Brockmeyer	Phone conference with client to interview re: Schedules and Statement of Financial Affairs for draft petition preparation	1.4	\$ 325.00	\$ 455.00
9/23/2021	Beth M. Brockmeyer	Redraft Rushmore Loan Servicing authorization with corrected zip code	0.1	\$ -	\$ -
9/23/2021	Beth M. Brockmeyer	Phone call to Rushmore Loan Servicing to obtain Note, payoff and reinstatement figures	0.6	\$ -	\$ -
9/24/2021	Beth M. Brockmeyer	Review documents needed for schedule preparation provided by client in email	0.1	\$ -	\$ -
9/24/2021	Beth M. Brockmeyer	Email to Attorney N. Hahn re settlement offer re: FACC mortgage	0.1	\$ 325.00	\$ 32.50

9/27/2021	Beth M. Brockmeyer	Update draft petition with notes from phone conference with client; review documents provided by client (2.0); call to Rushmore for payoff, reinstatement figures and status of modification (.4); memo to file; email to client re needed information (.4)	2.8	\$ 325.00	\$ 910.00
10/1/2021	Beth M. Brockmeyer	Email to client re status of needed documents	0.1	\$ -	\$ -
10/4/2021	Beth M. Brockmeyer	Review payoff and reinstatement figures provided by Rushmore Loan Servicing; updated draft petition; updated memo to file and email to client re needed documents	0.6	\$ -	\$ -
10/5/2021	Beth M. Brockmeyer	Edits to petition	0.3	\$ 325.00	\$ 97.50
10/7/2021	Beth M. Brockmeyer	Phone conference with JWM re status and mortgage issues	0.2	\$ 325.00	\$ 65.00
10/7/2021	Beth M. Brockmeyer	Email exchange with client re: mortgage mod status/options (.2); email and phone conference with Attorney N. Hahn re:FACC mortgage (.2); phone call to Rushmore re mortgage modification packet (.2)	0.6	\$ 325.00	\$ 195.00
10/7/2021	Beth M. Brockmeyer	Review Notice of Appearance in state court foreclosure action drafted by SMH	0.1	\$ 325.00	\$ 32.50
10/8/2021	Virginia George	Meet with BMB re tracking lender on FDIC website	0.2	\$ -	\$ -

10/8/2021	Beth M. Brockmeyer	Review mortgage modification application prior to phone conference with client (.2); phone conference with client to review mortgage modification application and collect missing information needed for schedules (.8); search for correct successor entity on FDIC website with VEG (.2); call and email to State Bank of Texas re: Legacy Bank debt (.4); review client tax returns and email to client re: missing pages of returns (.3); update to petition based on earlier phone call with client (.3); review mortgage priority (.3); phone conference with Jose Munoz of State Bank of Texas and follow up email with additional information (.4); review client draft of hardship letter for loan modification (.2)	3.1	\$ 325.00	\$ 1,007.50
10/11/2021	Beth M. Brockmeyer	Review client hardship letter notes and begin draft of hardship letter for loan modification with Rushmore Loan Servicing (.3)  Phone conference with client re information on job history needed for hardship letter for loan modification and reviewed issues with mortgag holders and items still needed form client to proceed (.4)	0.7	\$ 325.00	\$ 227.50
10/11/2021	Beth M. Brockmeyer	Draft hardship letter	0.3	\$ 325.00	\$ 97.50
10/13/2021	Beth M. Brockmeyer	Follow up on Notice of Appearance filed in foreclosure action	0.1	\$ -	\$ -
10/15/2021	Beth M. Brockmeyer	Email to client re: status of needed information	0.1	\$ 325.00	\$ 32.50
10/19/2021	Beth M. Brockmeyer	Continue draft client hardship letter for mortgage modification; continue draft mortgage modification application	0.5	\$ 325.00	\$ 162.50
10/19/2021	Beth M. Brockmeyer	organize efile	0.4	\$ -	\$ -

10/22/2021	Beth M. Brockmeyer	follow up email to J. Munoz at State Bank of Texas re: Legacy Bank mortgage issue	0.1	\$ 325.00	\$ 32.50
10/25/2021	Beth M. Brockmeyer	Review email from client re: business income and expenses (.1); phone conference with client re: same (.2)	0.3	\$ 325.00	\$ 97.50
10/26/2021	Beth M. Brockmeyer	Phone conference with J. Munoz of State Bank of Texas re: FDIC must approve lien release and FDIC contact information (1); phone conference with FDIC re: providing payoffs or lien releases (.1)	0.2	\$ 325.00	\$ 65.00
10/28/2021	Beth M. Brockmeyer	Review FDIC lien release requirements	0.2	\$ 325.00	\$ 65.00
10/29/2021	Beth M. Brockmeyer	Phone call to Bay Title re: FDIC title requirement (.1); submit inquiry to FDIC portal re: Legacy Bank mortgage (.4)	0.5	\$ 325.00	\$ 162.50
11/1/2021	Beth M. Brockmeyer	Review email from FDIC re: title work needed to proceed for lien release or payoff	0.1	\$ 325.00	\$ 32.50
11/2/2021	Beth M. Brockmeyer	Phone call to FDIC re: lien release (.2); email exchange with client re: FDIC title work requirement, cost of title work and need for income and expense information (.2)	0.4	\$ 325.00	\$ 130.00
11/3/2021	Beth M. Brockmeyer	Email to title company to request letter report	0.2	\$ 325.00	\$ 65.00
11/4/2021	Beth M. Brockmeyer	Review letter report (.2) ; attempt to submit documents to FDIC portal, phone call to FDIC and email documents as portal not uploading documents (.6)	0.8	\$ 325.00	\$ 260.00
11/8/2021	Beth M. Brockmeyer	Email to Attorney N. Hahn for FACC re: status of Chapter 13 filing	0.1	\$ 325.00	\$ 32.50
11/9/2021	Beth M. Brockmeyer	Review Motion for Summary Judgment filed in foreclosure action	0.1	\$ 325.00	\$ 32.50
11/10/2021	Beth M. Brockmeyer	Provide instructions to paralegal to download foreclosure case filings from CCAP	0.1	\$ -	\$ -

11/11/2021	Beth M. Brockmeyer	Review filings in foreclosure case, initial answer and orders related to lien priority (.5); review documents needed for modification on first mortgage and email to client re: same (.4)	0.9	\$ 325.00	\$ 292.50
11/16/2021	Beth M. Brockmeyer	Phone conference with JWM re: status of foreclosure and bankruptcy cases	0.2	\$ 325.00	\$ 65.00
11/16/2021	Beth M. Brockmeyer	Call to FDIC re: Legacy Bank status of lien release (.2) review client mailing with bank statements, business income and expenses (.3); phone conference with client Re; same (.2); continue to review bank statements for business income and expenses and begin Means Test calculations (1.9); email to client re: needed information (.3)	2.9	\$ 325.00	\$ 942.50
11/17/2021	Beth M. Brockmeyer	Phone conference with Mr. Hurt of the FDIC re: Legacy Bank mortgage	0.3	\$ 325.00	\$ 97.50
11/17/2021	Beth M. Brockmeyer	Continue review of bank statements for business income (.2); phone conference with client re: status of foreclosure, continue review of bank statements for business income and discussed format for providing business income (.8); email to client regarding income information needed for filing and provided template for business expenses (.5)	1.5	\$ 325.00	\$ 487.50
11/17/2021	Beth M. Brockmeyer	Phone conference with JWM re: status of case (.2); email to client re status of foreclosure action (.4); continue review of banks statements provided by client to update Means Test (.6); review draft of petition for for time sensitive updates needed for filing (.8)	2	\$ 325.00	\$ 650.00
11/18/2021	Beth M. Brockmeyer	Meet with JWM to review draft of petition and discuss mortgage lien treatment in Chapter 13	2.7	\$ 325.00	\$ 877.50



11/18/2021	Beth M. Brockmeyer	Review bank statements for business income and (1.0); email to client with questions re: business income (.2)	1.2	\$ 325.00	\$ 390.00
11/19/2021	Beth M. Brockmeyer	Phone conference with client to review draft after JWM review (.3)	0.3	\$ 325.00	\$ 97.50
11/19/2021	Beth M. Brockmeyer	Review monthly business expenses and prepare for phone conference (.3); edits to petition after phone conference with client; (1.1) email to client with request for information (.6); phone conference with JWM re: status (.1); review DFI instructions for opening an LLC (.2)	2.2	\$ 325.00	\$ 715.00
11/19/2021	Beth M. Brockmeyer	Locate links for LLC formation and provide to client with instructions by email (.2); draft expense portion of means test (.4)	0.6	\$ 325.00	\$ 195.00
11/19/2021	Beth M. Brockmeyer	Email exchange with State Bank of Texas and FDIC re: release of Legacy Bank mortgage and money judgment	0.3	\$ 325.00	\$ 97.50
11/22/2021	John W. Menn	Review FDIC Mortgage release and email with BMB re: same	0.1	\$ 425.00	\$ 42.50
11/22/2021	Beth M. Brockmeyer	Review FDIC release (.2); email exchange with client re: LLC formation (.1); review bank statements to calculate year to date gross business income (.2)	0.5	\$ 325.00	\$ 162.50
11/23/2021	Beth M. Brockmeyer	Two phone calls with client re: outstanding items needed for filing (.2); multiple email exchange with client re: LLC formation, items needed and updates to draft petition (1.3); phone conference with client re: items needed (.1); Teams meeting with JWM to begin drafting plan (1.1) ; email to client re: ongoing list fo items needed (.4); work with SMH to file release of Legacy Bank mortgage in Simplefile (.2)	3.3	\$ 325.00	\$ 1,072.50

11/24/2021	Beth M. Brockmeyer	Review documents sent by client for updating petition (.3); multiple email exchanges with client re: items needed for filing petition (.3); updated draft petition with LLC information and applied Wisconsin exemptions (1.0); draft email to client re: items still needed for filing (.2); add creditor to petition (.1)	1.9	\$ 325.00	\$ 617.50
11/29/2021	John W. Menn	Edits to chapter 13 Plan, and conduct Zoom meeting with client to review, edit, and finalize petition, schedules, and plan, and file the same	2.4	\$ 425.00	\$ 1,020.00
11/29/2021	Beth M. Brockmeyer	Review client emails and update petition for day of filing	0.9	\$ 325.00	\$ 292.50
11/29/2021	Beth M. Brockmeyer	Teams meeting with JWM to write plan	2	\$ -	\$ -
11/29/2021	Beth M. Brockmeyer	Zoom meeting with client and JWM to review petition and sign	1.6	\$ -	\$ -
11/29/2021	Beth M. Brockmeyer	Final edits prior to filing; meet with JWM	0.5	\$ -	\$ -
11/29/2021	Beth M. Brockmeyer	Emails to Attorneys. N. Hahn and S. Schmeling re Chapter 13 filing	0.1	\$ 325.00	\$ 32.50
11/30/2021	Cynthia A. Krutke	Prepare 341 letter to client.	0.1	\$ 180.00	\$ 18.00
11/30/2021	John W. Menn	Follow up with client re: 341 letter and bankruptcy obligations post-petition	0.2	\$ 425.00	\$ 85.00
12/1/2021	Beth M. Brockmeyer	Phone conference with CAK re: mortgage modification documents needed	0.1	\$ -	\$ -
12/3/2021	Beth M. Brockmeyer	Draft satisfaction of judgment for Legacy Bank money judgment in Brown County	0.4	\$ 325.00	\$ 130.00
12/3/2021	Beth M. Brockmeyer	Draft Motion for Mortgage Modification (.4); begin draft of email to client re same (.1)	0.5	\$ 325.00	\$ 162.50
12/6/2021	Beth M. Brockmeyer	Continue email re: MMM program fees and brief phone conference with client re same	0.1	\$ 325.00	\$ 32.50
12/8/2021	Beth M. Brockmeyer	Continue draft of satisfactions of judgment for Legacy Bank in Brown and Washington Counties (.2); email to J. Munoz at State Bank of Texas re: same (.1)	0.3	\$ 325.00	\$ 97.50

12/9/2021	John W. Menn	Review notes and email with BMB re: stipulation to modify mortgage and resolve all issues with First American Capital	0.1	\$ 425.00	\$ 42.50
12/9/2021	Beth M. Brockmeyer	Review email from JWM re: phone call with Attorney N. Hahn re: First American Capital Mortgage	0.1	\$ 325.00	\$ 32.50
12/9/2021	Beth M. Brockmeyer	Phone conference with JWM re: assignment to draft stipulation and motion for settlement with First American Capital	0.1	\$ -	\$ -
12/10/2021	Beth M. Brockmeyer	Phone call with J. Munoz re: lien releases for Legacy Bank are being mailed today	0.1	\$ -	\$ -
12/13/2021	Beth M. Brockmeyer	follow up text to client on signing MMM documents (.1); review documents collected and determine documents needed for MMM (.4); email to client with list and attachments re documents needed for MMM (.2)	0.7	\$ 325.00	\$ 227.50
12/13/2021	Beth M. Brockmeyer	Phone conference with Attorney N. Hahn re: FACC stipulation interest rate and SBA loan questions (.1); email to client re same (.2)	0.3	\$ 325.00	\$ 97.50
12/14/2021	Cynthia A. Krutke	Prepare draft of DMM Portal DocuMods packet	0.5	\$ 180.00	\$ 90.00
12/14/2021	Beth M. Brockmeyer	Email and text exchange with client re: LLC documents needed by client (.1); phone conference with client re: documents needed for MMM program and discussed stipulation with FACC (.3); gathered documents for MMM portal submission (.3)	0.7	\$ 325.00	\$ 227.50
12/15/2021	Beth M. Brockmeyer	Begin draft of stipulation with FACC	1.8	\$ 325.00	\$ 585.00
12/16/2021	Beth M. Brockmeyer	Review complete copy of 2019 tax returns (.1); review returned mail from Rushmore Loan Servicing (1); phone call to Rushmore to obtain correct address (.1); email to DBK re: new address for Rushmore (.1)	0.4	\$ 325.00	\$ 130.00
12/20/2021	Beth M. Brockmeyer	Continue draft of stipulation with FACC	0.3	\$ 325.00	\$ 97.50

12/20/2021	Beth M. Brockmeyer	Continue gathering documents for mortgage modification; review income and expenses for Oct and Nov and draft P & L (.3)	0.3	\$ 325.00	\$ 97.50
12/20/2021	Beth M. Brockmeyer	Phone conference with HS re: filing satisfactions and converting Brown County case to efilings (.1); file satisfaction for Legacy Bank judgments including working with assistant to navigate electronic filing system and troubleshooting issues (1.1)	1.2	\$ -	\$ -
12/21/2021	Beth M. Brockmeyer	Edits to hardship letter	0.1	\$ 325.00	\$ 32.50
12/22/2021	Beth M. Brockmeyer	Review DWD proof of claim	0.1	\$ 325.00	\$ 32.50
12/23/2021	Beth M. Brockmeyer	Email to client with hardship letter for signature	0.1	\$ 325.00	\$ 32.50
12/28/2021	Beth M. Brockmeyer	Review email from trustee re: amending plan re: second mortgage modification/stipulation (.1); edit stipulation and email to Attorney N. Hahn for review (.2)	0.3	\$ 325.00	\$ 97.50
1/3/2022	Beth M. Brockmeyer	Multiple email exchanges with client re: TFS system payments (.2); email to client laying out trustee and mortgage payments going forward (.2); review language suggested by Attorney Nick Hahn for FACC stipulation (.2)	0.5	\$ 325.00	\$ 162.50
1/4/2022	Beth M. Brockmeyer	Phone conference with JWM re: suggested language by Attorney N. Hahn on FACC stipulation	0.1	\$ 325.00	\$ 32.50
1/5/2022	Beth M. Brockmeyer	Draft edits to stipulation with FACC la (.5); review redlines after JWM review (3.); two phone conferences with client re: stipulation with FACC and 341 hearing (.2); email final draft of stipulation to Attorney N. Hahn (.1)	1	\$ 325.00	\$ 325.00
1/5/2022	Beth M. Brockmeyer	clean up efile organization	0.3	\$ -	\$ -

1/5/2022	John W. Menn	Email client re: TFS, physical check plan payments, and 341 meeting (.2); review and edit stip with FACC and email to BMB for finalization (.3)	0.5	\$ 425.00	\$ 212.50
1/6/2022	Beth M. Brockmeyer	Attend 341 hearing by phone with JWM	0.5	\$ -	\$ -
1/6/2022	John W. Menn	Attend telephonic 341 meeting (.3); review claims and make updates to plan in Best Case (.2)	0.5	\$ 425.00	\$ 212.50
1/7/2022	Beth M. Brockmeyer	Text exchange with client re: 341 hearing and 1099 employee (.1); phone call with Rushmore Loan Servicing re: mortgage modification (.3); email Attorney S. Schmeling RE: Rushmore mortgage modification (.1)	0.5	\$ 325.00	\$ 162.50
1/11/2022	Beth M. Brockmeyer	Text and email exchange with client re: Verizon account on bankruptcy review	0.1	\$ 325.00	\$ 32.50
1/12/2022	Beth M. Brockmeyer	Follow up voicemail and email to Attorney S. Schmeling re: Order signed on Mortgage Modification	0.1	\$ 325.00	\$ 32.50
1/13/2022	Beth M. Brockmeyer	Email to Attorney N. Hahn re: signature on stipulation with FACC	0.1	\$ 325.00	\$ 32.50
1/20/2022	Beth M. Brockmeyer	Email to client with explanation of final FACC stipulation terms	0.3	\$ 325.00	\$ 97.50
1/31/2022	Beth M. Brockmeyer	Follow up email to Attorney S. Schmeling re: Rushmore filing POC and MMM program (.1); review POC's for secured creditors that have filed (.1)	0.2	\$ 325.00	\$ 65.00
2/3/2022	John W. Menn	Phone call with BMB re: amended plan requirements / details	0.1	\$ -	\$ -
2/3/2022	Beth M. Brockmeyer	Phone call with JWM re: drafting amended plan (.1); review items still needed for MMM and email to client re: same (.2); draft amended plan (.6); review paralegal draft of MMM submissions for updating (.2)	1.1	\$ 325.00	\$ 357.50
2/7/2022	John W. Menn	Teams meeting with BMB re: pending MMM issues	0.1	\$ -	\$ -

2/7/2022	Beth M. Brockmeyer	Teams meeting with JWM to review status of MMM (.1); draft MMM payment letter to client and review Rushmore proof of claim on file to determine MMM payment (.5); review Rushmore proof of claim, including attorney fees and costs in excess of \$11,000 for foreclosure action (.8)	1.4	\$ 325.00	\$ 455.00
2/8/2022	John W. Menn	Teams meeting with BMB re: pending MMM issues	0.2	\$ -	\$ -
2/8/2022	Beth M. Brockmeyer	Phone call with client re: mortgage and plan payments and documents needed for MMM (.1); Teams meeting with JWM re: same (.2); email to client re: same (.4)	0.7	\$ 325.00	\$ 227.50
2/9/2022	John W. Menn	Phone call with BMB re: MMM docs / P&L documens	0.2	\$ -	\$ -
2/9/2022	Beth M. Brockmeyer	Review client email with breakdown of business income and expenses and calculate business income (.9); phone conference with client re: same (.1); phone conference with JWM re: profit & loss statement for MMM program (.2); edits to profit & loss statement prepared by SMH (.1); email exchange with Attorney N. Hahn re: payment instructions for FACC mortgage (.1); continue preparation of documents for MMM submission (.7); phone conference with client re: same (.1); email to client re: mailing FACC payment (.1)	2.3	\$ 325.00	\$ 747.50
2/10/2022	John W. Menn	Review and edit MMM Docs to prep for signature	1.7	\$ 445.00	\$ 756.50
2/10/2022	Beth M. Brockmeyer	Meet with JWM to review and edit draft of mortgage modification docs drafted by CAK	1.5	\$ -	\$ -
2/11/2022	Beth M. Brockmeyer	Phone conference with client re: FACC payment (.1); email /and text to client with FACC payment instructions (.1); edits MMM documents (.7); emails to client with MMM documents to sign (.2)	1.1	\$ 325.00	\$ 357.50

2/14/2022	Cynthia A. Krutke	Review and organize MMM docs and prepare them for uploading to the portal; email to attorney regarding missing signature pages	0.5	\$ 190.00	\$ 95.00
2/14/2022	Beth M. Brockmeyer	Email exchange with client re: signature pages for mortgage mediation	0.2	\$ 325.00	\$ 65.00
2/15/2022	Beth M. Brockmeyer	Email to Attorney M. Dimand for Rushmore Loan Servicing that documents will be uploaded to MMM portal today	0.1	\$ 325.00	\$ 32.50
2/16/2022	Beth M. Brockmeyer	Email to Attorney J. Dimand re: Rushmore accessing MMM portal	0.1	\$ 325.00	\$ 32.50
2/17/2022	Beth M. Brockmeyer	Research Chapter 13 business debtor issues under sections 1304 & 364(a)	1.7	\$ 325.00	\$ 552.50
2/17/2022	Beth M. Brockmeyer	Email to Attorney M. Dimand re: his client accessing the MMM portal	0.1	\$ 325.00	\$ 32.50
2/18/2022	Beth M. Brockmeyer	Follow up text to client re: homeowner's insurance (.1); review mediation appointment order and email to client re: directions for paying mediation fee (.2)	0.3	\$ 325.00	\$ 97.50
2/23/2022	Beth M. Brockmeyer	Teams meeting with JWM re: first mortgage payments and plan modification (.1); edit plan modification (.2); email to client re: first mortgage payments (.1); phone call with client re: plan, mortgage and mediator payments (.3)	0.7	\$ 325.00	\$ 227.50
2/28/2022	John W. Menn	Review and edit plan mod, and email BMB re: final changes / filing plan	0.1	\$ 445.00	\$ 44.50
2/28/2022	Beth M. Brockmeyer	Final edits to draft of amended plan (.4); email to client with amended plan for review (.2); text to client re: question on certified articles of incorporation (.1)	0.7	\$ 325.00	\$ 227.50

3/1/2022	Beth M. Brockmeyer	Text exchange with client re: review amended plan (.1); phone call with client re: review of amended plan (.1); email to DBK re: filing amended plan (.1); email exchange with Attorney J. Marchinowski re: amended plan to be filed today (.1)	0.4	\$ 325.00	\$ 130.00
3/1/2022	Beth M. Brockmeyer	Continue research on Chapter 13 business debtor issues and email to JWM re: same	0.8	\$ 325.00	\$ 260.00
3/3/2022	Beth M. Brockmeyer	Email exchange with client re: automated payments to FACC and review stipulation for grace period	0.2	\$ 325.00	\$ 65.00
3/8/2022	Beth M. Brockmeyer	Phone conference with client re: Wisconsin Help for Homeowners and call from creditor (.1); research Wisconsin Help for Homeowners program and left message for NEWCAP for Brown County applicants (.7)	0.8	\$ -	\$ -
3/9/2022	Beth M. Brockmeyer	Multiple phone calls and email to client while she completed Wisconsin Help for Homeowners Application	0.5	\$ 325.00	\$ 162.50
3/11/2022	Beth M. Brockmeyer	Meet with JWM re: objection to Rushmore Servicing proof of claim Review CCAP docket, proof of claim filed by Rushmore and draft email to Attorney Dimand re: attorney's fees included in proof of claim for litigation with FACC	0.1	\$ 325.00	\$ 32.50
3/14/2022	Beth M. Brockmeyer	Teams meeting with BMB re: Rushmore POC	1	\$ 325.00	\$ 325.00
3/15/2022	John W. Menn	Teams meeting with JWM re: attorney fees on proof of claim (.1); continue to review proof of claim to propose settlement amount for attorney fees in foreclosure (.3)	0.1	\$ -	\$ -
3/15/2022	Beth M. Brockmeyer	Final review of attorney fees in proof of claim and edits to email to Attorney M. Dimand	0.4	\$ 325.00	\$ 130.00
3/16/2022	Beth M. Brockmeyer		0.2	\$ 325.00	\$ 65.00



3/17/2022	Beth M. Brockmeyer	Phone conference with client re: bankruptcy inquiry mailed to her by John Hancock (.1); review proof of claim filed by State of Wisconsin re: Foodshare (.1)	0.2	\$ 325.00	\$ 65.00
3/18/2022	Cynthia A. Krutke	Email to client regarding mortgage statement.	0.1	\$ 190.00	\$ 19.00
3/21/2022	John W. Menn	Teams meeting with BMB re: insurance letter issues	0.1	\$ -	\$ -
3/21/2022	Beth M. Brockmeyer	Teams Meeting with JWM re: explanation of bankruptcy letters to insurance companies	0.1	\$ 325.00	\$ 32.50
3/22/2022	Beth M. Brockmeyer	Phone conference with client re: John Hancock insurance letter re: request for appointment (.1); draft letter to John Hancock re: bankruptcy background and request for appointment (1)	1.1	\$ 325.00	\$ 357.50
3/25/2022	Beth M. Brockmeyer	Email to client with proof of claim for Foodshare overpayment and draft letter to John Hancock re: bankruptcy status	0.2	\$ 325.00	\$ 65.00
3/28/2022	John W. Menn	Review and edit letter to John Hancock insurance	0.1	\$ 445.00	\$ 44.50
3/28/2022	Beth M. Brockmeyer	Teams meeting with JWM to review letters to insurance companies (.2); edits to John Hancock letter re: Ch 13 explanation (.2); draft Independent Order of Foresters Chapter 13 explanation letter (.3); text exchange with client re: letters and homeowners insurance (.1)	0.8	\$ 325.00	\$ 260.00
3/28/2022	Cynthia A. Krutke	Email to client with letter received from TransUnion.	0.1	\$ 190.00	\$ 19.00
3/31/2022	Beth M. Brockmeyer	Email to client re: escrow shortage and new payment amount	0.2	\$ 325.00	\$ 65.00
4/6/2022	Cynthia A. Krutke	Prepare draft of Fee Application for SLLP.	0.3	\$ 190.00	\$ 57.00
4/8/2022	John W. Menn	Review and finalize Fee Application for SLLP.	0.5	\$ 445.00	\$ 222.50
<b>Total Attorney Fees:</b>			<b>95</b>	<b>\$ 25,840.00</b>	

**Date**

**Cost Description**

**Amount**

9/21/2021	Real estate document search and print fee.	\$ 23.11
11/4/2021	Fee for Real Estate Title Report to Bay Title.	\$ 75.00
11/23/2021	Release of Mortgage filed with Brown County via Simplifile	\$ 35.00
11/29/2021	Chapter 13 filing fee	\$ 313.00
12/14/2021	DMM Portal DocuMod preparation fee.	\$ 60.00
12/14/2021	Copy expense-Notice of Motion and Motion for Referral to Mortgage Modification Mediation Program	\$ 2.00
12/14/2021	Postage expense-Notice of Motion and Motion for Referral to Mortgage Modification Mediation Program	\$ 1.06
12/16/2021	Copy expense-Ch. 13 plan, 341 notice, Notice of Motion and Motion for Referral to Mortgage Modification Mediation Program to Rushmore Loan Management	\$ 3.00
12/16/2021	Postage expense-Ch. 13 plan, 341 notice, Notice of Motion and Motion for Referral to Mortgage Modification Mediation Program to Rushmore Loan Management	\$ 0.73
12/20/2021	Satisfaction of Judgment Filing	\$ 5.14
12/22/2021	Check 17749 Brown County Clerk of Courts Satisfaction of Judgment	\$ 5.00
2/16/2022	DMM Portal Participation Fee.	\$ 60.00
3/1/2022	Copy expense - Notice and Request to Amend Unconfirmed Chapter 13 Plan	\$ 20.00
3/1/2022	Postage expense - Notice and Request to Amend Unconfirmed Chapter 13 Plan	\$ 13.25
4/8/2022	Postage expense for mailing of Fee Application for SLLP.	\$ 12.19
4/8/2022	Copy expense for mailing of Fee Application for SLLP.	\$ 6.90
	<b>Total Costs:</b>	<b>\$ 635.38</b>
	<b>Total Fees and Costs:</b>	<b>\$ 26,475.38</b>
	<b>Less Pre-petition Payments</b>	<b>\$ (2,048.00)</b>

<b><i>Post-Petition Balance Payable:</i></b>	<b><i>\$ 24,427.38</i></b>
<b><i>Less Trust Acct Balance (rec'd Post-petition)</i></b>	<b><i>\$ (80.14)</i></b>
<b><i>Net Payable through Plan</i></b>	<b><i>\$ 24,347.24</i></b>

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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In re:

Tena M Hendrickson,

Case No. 21-26103-beh

Chapter 13

Debtor.

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**EXHIBIT B – SUMMARY OF PROFESSIONALS**

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Pursuant to Local Rule 2016(a)(1), following is a list of all attorneys, professionals, paraprofessionals or other timekeepers performing services on the case long with a description of the experience, length of professional practice, and billing rate for each:

**John W. Menn**

**Partner, Admitted in 2009**

**\$425.00 to \$445.00 per hour during the fee period**

Attorney John W. Menn graduated from the University of Wisconsin Law School in 2009. Since 2009, he has primarily practiced in the areas of bankruptcy and matters related to insolvency, foreclosure, mortgage modification, and financial reorganization. His experience has involved representing debtors in all aspects of cases in chapters 7, 11, 12 and 13 of the Bankruptcy Code, and representing both debtors and creditors in adversary proceedings. He is a member of the American Bankruptcy Institute, Young Lawyers Division of the Wisconsin State Bar Association, and the Fox Valley Young Lawyers Association. He has also been a presenter at the Annual Bankruptcy, Insolvency, and Creditors' Rights section annual conference on various chapter 7, 12, and 13 topics.

**Virginia E. George**

**Partner, Admitted in 1988**

**\$475.00 per hour (nominal time discounted to \$0.00 on this matter)**

Attorney Virginia E. George is a Partner in the Milwaukee and Oshkosh Offices of Steinhilber Swanson LLP. She was admitted to practice in 1988 and has served as a Chapter 7 Panel trustee in the Eastern District of Wisconsin (Milwaukee Division) since 1999. She has, for 25 years, been peer rated "AV" at Martindale Hubbell. She has extensive experience in all aspects of Chapter 7, 11, 12 and 13 of the Bankruptcy Code including large liquidating Chapter 7 Asset cases and all types of adversary proceedings and enforcement actions. For the past 25 years she has concentrated over 95% of her practice in bankruptcy and insolvency matters, also serving as receiver in state and federal court and having previously represented a national lender in its Special Assets Division. She is a past two-term board member of the Bankruptcy Insolvency and Creditor's Rights Section of the State Bar of Wisconsin. She is a regular presenter at conferences on various bankruptcy topics.

**Beth M. Brockmeyer**  
**Senior Associate, Admitted in 1995**  
**\$325.00 per hour**

Attorney Beth M. Brockmeyer is an associate attorney in the Milwaukee office and a member of the firm's Bankruptcy group. She represents individuals and businesses in restructurings, financial reorganization, receiverships, bankruptcy, and other debt adjustment strategies. Beth has extensive experience in all aspects of Chapter 7 and 13 of the U.S. Bankruptcy Code including consumer and business cases. She is a frequent speaker and published author on various bankruptcy topics. Beth is a former board member of the Bankruptcy, Insolvency and Creditors' Rights Section of the Wisconsin State Bar.

**Cynthia A. Krutke, SBWCP**  
**Paralegal since 1999**  
**\$180.00 to \$190.00 per hour during the fee period**

Cynthia A. Krutke received her B.A. in International Studies, with minors in Business and Spanish, from the University of Wisconsin – Oshkosh in 1990. She began working for the firm in 1994, handling reception and billing duties from 1994 – 1998. She has been a practicing paralegal since 1999, practicing primarily in the areas of bankruptcy, probate, real estate transactions, estate planning, and business / corporate law. Her experience has involved assisting in the representation of debtors and creditors in all aspects of cases in chapters 7, 11, 12 and 13 of the Bankruptcy Code, and adversary proceedings. She is a State Bar of Wisconsin Certified Paralegal.

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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In re:

Tena M Hendrickson,

Case No. 21-26103-beh

Chapter 13

Debtor.

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**CERTIFICATE OF SERVICE FOR  
NOTICE OF APPLICATION FOR ALLOWANCE AND PAYMENT OF  
FEES AND EXPENSES OF DEBTOR'S COUNSEL**

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STATE OF WISCONSIN     )  
                                      )   SS  
WINNEBAGO COUNTY     )

Cynthia Krutke, being first duly sworn, on oath deposes and says that she is paralegal with Steinhilber Swanson LLP, and that on April 8, 2022, she filed a true copy of the *Notice and Application for Allowance and Payment of Fees and Expenses of Debtor's Counsel* in the above matter, via the Court's CM/ECF System, and mailed a complete copy of the same by regular mail, securely enclosed in an envelope with postage paid thereon, and addressed to the following:

Tena M. Hendrickson  
2400 Cedar Ridge  
Green Bay, WI 54313

Cynthia Krutke further states that on April 8, 2022, she mailed a copy of the *Notice* of the above Application by regular mail, securely enclosed in an envelope with postage paid thereon, and addressed to the following:

SEE ATTACHED LIST

/s/ Cynthia Krutke  
Cynthia Krutke

Subscribed and sworn to before me  
this April 8, 2022.

/s/ John W. Menn  
John W. Menn, Notary Public  
State of Wisconsin  
My commission is permanent.

Label Matrix for local noticing  
0757-2  
Case 21-26103-beh  
Eastern District of Wisconsin  
Milwaukee  
Fri Apr 8 11:28:09 CDT 2022

~~ATKINS, NICHOLAS, HANN~~  
Godfrey & Kahn DUPLICATE  
100 West Lawrence St.  
Appleton, WI 54911-5773

Department of Workforce Development  
Division of Unemployment Insurance  
Collections - Tax  
P.O. Box 7945  
Madison, WI 53707-7945

(p)DISCOVER FINANCIAL SERVICES LLC  
PO BOX 3025  
NEW ALBANY OH 43054-3025

Green Bay Radiology  
c/o Finance Systems  
PO Box 1597  
Green Bay, WI 54305-1597

Nancy Sievers  
1832 Briarwood Court  
De Pere, WI 54115-2456

Small Business Administration  
740 Regent St., Suite 100  
Madison, WI 53715-2648

The Huntington National Bank  
P O Box 89424  
Cleveland OH 44101-6424

Wisconsin Department of Revenue  
2135 Rimrock Rd.  
PO Box 8906  
Madison, WI 53708-8906

Rebecca R. Garcia VIA CM/ECF  
Chapter 13 Trustee  
PO Box 3170  
Oshkosh, WI 54903-3170

First American Capital Corporation  
GODFREY & KAHN, S.C.  
100 West Lawrence Street  
Appleton, WI 54911-5773

Baycare Health Systems LLC  
c/o Finance Systems  
PO Box 1597  
Green Bay, WI 54305-1597

Department of Workforce Development  
Workers Compensation Division  
PO Box 7901  
Madison, WI 53707-7901

Door Peninsula Winery  
5806 Highway 42  
Sturgeon Bay, WI 54235-9767

Insolvency Unit West 17, Grp 4-Milwaukee  
Organization Code: SES:C:AIQ:WI7  
211 W. Wisconsin Ave, Stop 5301  
Milwaukee, WI 53203-2221

Office of the U. S. Trustee  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

State of Wisconsin - Dept of Children and Fa  
PO Box 8938  
Madison, WI 53708-8938

U.S. Bank Trust National Association,  
as Trustee of the Dwelling Series IV Tru  
c/o Rushmore Loan Management Services  
P.O. Box 55004  
Irvine, CA 92619-5004

Beth M. Brockmeyer VIA CM/ECF  
Steinhilber Swanson, LLP  
759 N. Milwaukee St.  
Suite 305  
Milwaukee, WI 53202-3714

Tena M. Hendrickson  
2400 Cedar Ridge  
Green Bay, WI 54313-5774

U.S. Bank Trust National Association, as Tru  
c/o Marinosci Law Group, P.C.  
Attn: Bankruptcy Department  
14643 Dallas Parkway, Suite 750  
Dallas, TX 75254-8884

Continuum Design LLC  
c/o Tena Hendrickson  
2400 Cedar Ridge Ct.  
Green Bay, WI 54313

~~Discover Bank~~ DUPLICATE  
Discover Products Inc  
PO Box 3025  
New Albany, OH 43054-3025

First American Capital Corporation, Inc.  
10710 W. Scharles Ave.  
Hales Corners, WI 53130-2031

Internal Revenue Service  
Centralized Insolvency Operation  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Rushmore Loan Management  
15480 Laguna Canyon Road, Suite 100  
Irvine, CA 92618-2132

State of Wisconsin-DWD  
Unemployment Insurance Division  
Collections-Tax  
PO Box 7945  
Madison, WI 53707-7945

USAA Savings Bank  
PO Box 330099  
San Antonio, TX 78265

John W. Menn VIA CM/ECF  
Steinhilber Swanson LLP  
107 Church Ave  
Oshkosh, WI 54901-4745